

EXHIBIT 8

1 UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
3

4 THE ESTATE OF NAJEE ALI)
5 BAKER, by and through his)
6 Ancillary Administrator,) No.
7 Jemel Ali Dixon,) 1:19-cv-00477-
8) CCE-LPA
9 Plaintiff,)
10)
11 vs.)
12)
13 WAKE FOREST UNIVERSITY, et
14 al.,
15)
16 Defendants.

17 The videoconference deposition of NATOSHIA MILES,
18 taken pursuant to notice before Vincent J. Bailey,
19 Certified Shorthand Reporter, on December 17, 2020, at
20 the hour of 9:56 a.m.

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1 event management strategies. Is that right?

2 A. Yes, in general throughout the meetings that I
3 would have with her and other Wake Forest staff.

4 Q. Okay. Based on those meetings, was it your
5 understanding that she agreed that access control was
6 an important risk management strategy for events at
7 The Barn?

8 A. Yes.

9 Q. Based on those discussions, was it your
10 understanding that Chief Lawson agreed that baggage
11 checks were an important security measure for events
12 at The Barn?

13 A. To my recollection, yes.

14 Q. Similarly, based on your discussions with Chief
15 Lawson, is it your understanding that she agreed that
16 having adequate coverage of entrances and exits at The
17 Barn was an important event management strategy?

18 A. Yes.

19 Q. Based on your conversations, was it your
20 understanding Chief Lawson agreed that it was an
21 important event management strategy to have law
22 enforcement officers inside The Barn during parties to
23 monitor the situation?

24 A. Not to my recollection.

25 Q. Okay. So it sounds like, was there a

1 disagreement on that point between --

2 A. I don't recall officers being inside any venue,
3 unless there's like a lobby area. I've never been
4 inside The Barn myself. I've seen pictures, but
5 officers would typically work outside the venue, as we
6 would with any other establishment.

7 It is generally our policy to remain
8 outside policy.

9 Q. That's not based on personal knowledge of The
10 Barn management itself, right?

11 A. It is not, no.

12 Q. Okay. I read Captain Watson's e-mail as
13 suggesting that an important event management strategy
14 could be to have officers inside The Barn to monitor
15 the situation.

16 A. I can't speak for Captain Watson, but he knew
17 our policy and typically officers would remain on the
18 outside of any venue.

19 Q. Okay. He also mentions that part of the
20 solution may be increased staffing he writes, quote,
21 "both on your end and possibly ours"?

22 A. Yes.

23 Q. Were you involved in discussions with Chief
24 Lawson in which you discussed the possibility of
25 increasing the staffing of Winston-Salem Police

1 STATE OF NORTH CAROLINA.)
2) SS:
3 COUNTY OF GUILFORD)
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5 I, Vincent Bailey, Certified
6 Shorthand Reporter, do hereby certify that NATOSHIA
7 MILES on December 17, 2020 was by me first duly sworn,
8 with the understanding of counsel as to the remote
9 status, to testify to the truth, and that the above
deposition was recorded stenographically by me and
transcribed by me.

10 I FURTHER CERTIFY that the foregoing
11 transcript of said deposition is a true, correct, and
12 complete transcript of the testimony given by the said
13 witness at the time and place specified.

14 I FURTHER CERTIFY that I am not a
15 relative or employee or attorney or employee of such
attorney or counsel, or financially interested
directly or indirectly in this action.

16 I FURTHER CERTIFY that I have signed
17 this notarial certificate on December 28, 2020,
according to the emergency video notarization
requirements contained in G.S. 10B-25.

18 IN WITNESS WHEREOF, I have set my
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18 Vincent Bailey
19 Certified Shorthand Reporter
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